From: Roberts, Yvette
To: Ann Burdett
Subject: Fwd: ANSWERS FOR YOUR CLIENT
Date: Tuesday, November 20, 2018 2:32:29 PM

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Hi.

Below were some helpful responses I received to answer your questions.

Thank you.

Regards,

Yvette Roberts
Customer Service Administrator
Industrial Business
VEOLIA NORTH AMERICA
tel +1 602 233-6891
fax +1 602 415 3030 / Toll Free 800/368-9095
5736 West Jefferson Street / Phoenix, AZ 85043

---------- Forwarded message ---------
From: **Bulsiewicz, Wayne** <wayne.bulsiewicz@veolia.com>
Date: Tue, Nov 20, 2018 at 2:13 PM
Subject: ANSWERS FOR YOUR CLIENT
To: Roberts, Yvette <yvette.roberts@veolia.com>

Spent Elemental Mercury (11 lbs total)

We have two PVC pipes (one 4" long and one approx. 8" long with sealed caps on each end) that contain spent elemental mercury. Are you OK with how this was packaged?

OKAY, BUT A NALGENE BOTTLE WOULD BE BETTER, WORRIED ABOUT THE CAPS COMING LOOSE.

Both PVC pipes were placed in one cardboard box and that cardboard box was placed in a DOT approved container with vermiculite (lab packed).

IS THAT CONTAINER A RIDGID CONTAINER SUCH AS A PLASTIC PAIL?

I have profiled it as hazardous waste under RQ, UN2809, Waste Mercury, 8(6.1), PG III (D009). Are you good with this? **YES**

I indicated Non-Wastewater with Sub Category >260 mg/kg total mercury (High Mercury-Organic Subcatergory) - Is this subcategory correct?

NO, IT IS INORGANIC NOT ORGANIC

If this subcategory is correct, then on the LDR it indicates I must complete the F039/UHC Form, do I just list D009 even though I will already list that under the LDR's EPA Waste Code section.

N/A

Universal Waste – Mercury contained in manufactured articles

We have managed these as UW in Colorado.

I have profiled these as RQ, UN3506, Waste Mercury Contained in Manufactured Articles, 8(6.1) (D009). Are you good with this?

YES DROP THE D009 SINCE IT IS NOT BEGIN SHIPPED AS HAZARDOUS WASTE, BUT UNIVERSAL WASTE ON A BOL.

They put all 4 thermostats (with intact Hg bulb inside plastic thermostat box) in a 1.25 gallon DOT approved container with vermiculite. Are you OK with the whole thermostat structure or should the Hg bulbs be removed and placed in container without the plastic housing?

OKAY AS IT IS.

--

Wayne Bulsiewicz
Environmental Health and Safety Manager
Industrial Business
VEOLIA NORTH AMERICA

tel +1 602 233 2955 / cell +1 602 725 7726 / fax +1 602 415 3030
5736 W Jefferson Street / Phoenix, AZ 85043
wayne.bulsiewicz@veolia.com
www.veolianorthamerica.com

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